

Exhibit E-1

The Commission's Rules under Section 73.203 require that an applicant file for only those allocations contained in the table of allotments under Section 73.202 of the Rules. It is respectfully submitted that although the specific allocation, which the applicant is requesting, is currently not in the table of allotments, this application is being filed pursuant to the one-step upgrade process authorized by the Commission.

It should be noted that a channel change for FM station KLCY at Vernal, Utah is also required to make the proposed allocation comply with the Commission's spacing requirements. An application for that facility is being filed simultaneously with this application.